

sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials, that is, a FujiFilm FinePix S5000 camera, a Nikon D80 camera, a Canon PowerShot SX200 camera, and a SanDisk 16GB thumb drive that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, all in violation of 18 U.S.C. Sections 2251(a) and (e).

Each of the foregoing allegations is hereby incorporated into each of the following counts as if fully set forth therein:

<u>Count</u>	<u>Date</u>	<u>File Name(s)</u>	<u>Camera</u>
1	03/02/09	_SCF9190.jpg, _SCF9191.jpg, _SCF9193.jpg	FujiFilm FinePix S5000
2	07/11/10	DSC0139.jpg, DSC0148.jpg, DSC0149.jpg	Nikon D80
3	11/12/10	DSC0153.jpg, DSC0154.jpg, DSC0157.jpg, DSC0160.jpg, DSC0164(2).jpg, DSC0178.jpg	Nikon D80
4	12/10/10	134515731814.jpg, 134524048686.jpg, DSC_0004.jpg, DSC_0009.jpg, DSC_0011.jpg, DSC_0029.jpg, DSC_0030.jpg, DSC_0031.jpg, DSC_0062.jpg through DSC_0068.jpg	Nikon D80
5	03/09/11	IMG_0004.jpg through IMG_0018.jpg; IMG_0020.jpg through IMG_0030.jpg; IMG_0033.jpg, IMG_0033.jpg, IMG_0048.jpg, IMG_0049.jpg	Canon PowerShot SX200
6	06/02/11	MVI_0289.mov	SanDisk 16GB thumb drive
7	06/24/11	IMG_0326 through IMG_0338	Canon PowerShot SX200

8	06/24/11	MVI_0325.mov, MVI_0337.mov	SanDisk 16GB thumb drive
9	08/21/11	IMG_0600.jpg, IMG_0604.jpg, IMG_0605.jpg, IMG_0606.jpg, IMG_0607.jpg	Canon PowerShot SX200
10	09/09/11	IMG_0695.jpg, IMG_0696.jpg, IMG_0697.jpg	Canon PowerShot SX200
11	09/23/11	MVI_0743.mov, MVI_0744.mov	SanDisk 16GB thumb drive
12	10/14/11	DSC_0062.jpg, DSC_0063.jpg, DSC_0064.jpg, DSC_0065.jpg, DSC_0066.jpg, DSC_0067.jpg, DSC_0068.jpg, DSC_0069.jpg, DSC_0070.jpg, DSC_0071.jpg, DSC_0072.jpg	Nikon D80
13	10/14/11	MVI_0748.mov	SanDisk 16GB thumb drive
14	11/17/11	MVI_0813.mov	SanDisk 16GB thumb drive

COUNT FIFTEEN

Distribution of Child Pornography

18 U.S.C. 2252A(a)(1), 2256(8)(A), and 2252A(b)(1)

THE GRAND JURY FURTHER CHARGES THAT:

The exact dates being unknown to the grand jury, but between in or around July, 2010, and on or about September 25, 2012, in the Southern District of Georgia, the defendant,

STEPHEN A. KEATING,

did unlawfully and knowingly transport child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which visual depictions are more fully described below, using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code,

Sections 2252A(a)(1), 2256(8)(A), and 2252A(b)(1).

File Created On Or About:

File Name(s)

07/11/10	DSC0139.jpg, DSC0148.jpg, DSC0149.jpg
11/12/10	DSC0153.jpg, DSC0154.jpg, DSC0157.jpg, DSC0160.jpg, DSC0164(2).jpg, DSC0178.jpg
12/10/10	134515731814.jpg, 134524048686.jpg, DSC_0004.jpg, DSC_0009.jpg, DSC_0011.jpg, DSC_0029.jpg, DSC_0030.jpg, DSC_0031.jpg, DSC_0062.jpg, DSC_0063.jpg, DSC_0064.jpg, DSC_00645.jpg DSC_0066.jpg, DSC_0067.jpg, DSC_0068.jpg
03/09/11	IMG_0004.jpg, IMG_0005.jpg
08/21/11	IMG_0600.jpg, IMG_0604.jpg, IMG_0605.jpg, IMG_0606.jpg, IMG_0607.jpg
09/09/11	IMG_0696.jpg, IMG_0697.jpg
10/14/11	134530786489.jpg

COUNT SIXTEEN

Possession of Child Pornography

18 U.S.C. 2252A(a)(5)(B), 2256(8)(A), and 2252A(b)(2)

THE GRAND JURY FURTHER CHARGES:

On or about the November 15, 2012, in the Southern District of Georgia, the defendant,

STEPHEN A. KEATING,

did knowingly possess material which contained one or more images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), other than those images identified in Counts One through Fifteen of this Indictment, that had been shipped and transported using any means and facility of interstate and foreign commerce, including by computer, or that was

produced using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18 United States Code Sections 2252A(a)(5)(B), 2256(8)(A), and 2252A(b)(2).

FORFEITURE NOTICE

The allegations contained in Counts One through Sixteen of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of any of the offenses alleged in Counts One through Sixteen of this Indictment, the defendant,

STEPHEN A. KEATING,

shall forfeit to the United States pursuant to 18 U.S.C. § 2253(a) any and all matter which contains visual depictions of minors engaged in sexually explicit conduct in violation of the charged offenses; any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations.

A TRUE BILL

Foreperson

(Signatures for the Keating Indictment are continued below.)

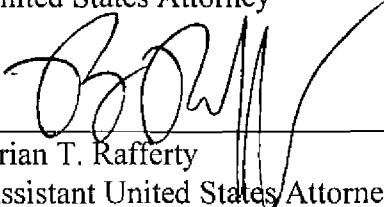
(Signatures for Indictment of Stephen A. Keating)



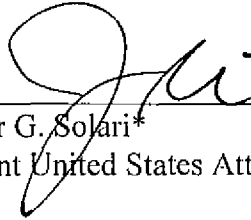
Edward J. Tarver
United States Attorney



James D. Durham
First Assistant United States Attorney



Brian T. Rafferty
Assistant United States Attorney
Chief, Criminal Division



Jennifer G. Solari*
Assistant United States Attorney

*Denotes Lead Counsel